

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SUSAN K. LINDSLEY, <i>et al.</i> ,)	Case No. 5:20-CV-00663
)	
Plaintiffs,)	JUDGE: SARA LIOI
)	
)	MAGISTRATE JUDGE:
)	KATHLEEN B. BURKE
vs.)	
)	<u>Plaintiffs Susan K. Lindsley's</u>
)	<u>Motion for seven (7) day stay of this</u>
)	<u>Honorable Court's November 17, 2020</u>
SPRINGFIELD TOWNSHIP, <i>et al.</i> ,)	<u>Order regarding the representation of</u>
)	<u>Plaintiff's minor children.</u>
Defendants.)	
)	

Now comes Plaintiff, Susan K. Lindsley, by and through counsel, and does hereby move this Honorable Court for a seven (7) day stay of this Court's November 17, 2020 Order (ECF # 27) regarding the representation of Plaintiff Susan Lindsley's two minor children and Mr. Paul Kelley's requirement to file a Motion for pro hac vice. Plaintiff's undersigned counsel submits that it fully understood this Court's November 17, 2020 Orders as well as the urgency and seriousness with which they were issued. Indeed, today undersigned counsel delivered to a document copying/duplication service over five (5) tabbed folders of organized documents, an audio CD, and two flash drives with video footage. These records are responsive to Defendants' various Requests for Production of Documents and are going to be placed on flash drives for all Defense counsel and Co-Plaintiff's counsel. These records were ordered with the instructions

that the order be completed as soon as possible. The work is expected to be completed this evening.

However, undersigned counsel has not been able to adequately communicate with Plaintiff Susan Lindsley regarding the representation of her minor children what role, if any, Mr. Paul Kelley will have in that representation. Plaintiff seeks a seven (7) day stay of the Court's November 17, 2020 Order to finalize an understanding with Ms. Lindsley and Mr. Kelley regarding the representation of Plaintiff's minor children. This request for a brief period of time takes into account both the Thanksgiving Holiday and the current stay-home orders recently issued by the City of Cleveland and Cuyahoga County.

WHEREFORE, Plaintiff Susan Lindsley moves this Honorable Court for an Order staying its November 17, 2020 Order (ECF # 27) or up to and including November 27, 2020, regarding Mr. Paul Kelley's requirement to file a motion for pro hac vice and/or for additional counsel to file a notice of representation of counsel, and/or Mr. Paul Cristallo to exclusively take over the representation of the minor Plaintiffs.

Respectfully submitted,

/s/ Paul J. Cristallo
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Counsel for Plaintiffs Susan K. Lindsley
and Minors G.M. and R.M..

CERTIFICATE OF SERVICE

I certify that on this 20th day of November, 2020 the foregoing Plaintiff Susan K. Lindsley's Motion for Seven (7) day Stay of This Court's November 17, 2020 Order Regarding the Representation of Plaintiff's Minor Children was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Paul J. Cristallo
PAUL J. CRISTALLO (0061820)
Counsel for Plaintiffs Susan K. Lindsley and
Minors G.M and R.M.